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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, as Trustee for SECURITIZED  
ASSET BACKED RECEIVABLES LLC  
TRUST 2007-BR3, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES 2007-  
BR3,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:21-cv-00297-JCM-EJY

**STIPULATION AND  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO MOTION FOR  
REMAND [ECF No. 14] AND MOTION  
FOR FEES AND COSTS [ECF No. 15]**

**(First Request)**

Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 22, 2021, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-829841-C [ECF No. 1-1];
2. On February 22, 2021, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
3. On March 24, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 14];
4. On March 24, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 15];
5. Fidelity’s deadline to respond to Deutsche Bank’s Motion for Remand and Motion for Costs and Fees is currently April 7, 2021;
6. Fidelity’s counsel is requesting an extension until Wednesday, April 28, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Fidelity requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Fidelity additional time to respond to the legal arguments set forth in Deutsche Bank’s motions;
8. Deutsche Bank does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1           **IT IS SO STIPULATED** that Fidelity's deadline to respond to Deutsche Bank's Motion  
2 for Remand [ECF No. 14] and Motion for Costs and Fees [ECF No. 15] is hereby extended  
3 through and including April 28, 2021.

4  
5 Dated: April 6, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
Attorneys for Defendant FIDELITY  
8 NATIONAL TITLE INSURANCE  
9 COMPANY

10  
11 Dated: April 6, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendant FIDELITY  
13 NATIONAL TITLE INSURANCE  
14 COMPANY

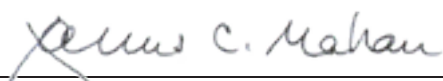
15 Dated: April 6, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Lindsay D. Robbins  
LINDSAY D. ROBBINS  
Attorneys for Plaintiff DEUTSCHE BANK  
17 NATIONAL TRUST COMPANY  
18

19 **IT IS SO ORDERED:**

20  
21 Dated: April 14, 2021

22 By:   
UNITED STATES DISTRICT COURT  
23 JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

